



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

MAY 19 2016

City of New Bedford
c/o Michele Paul, Director Office of Environmental Stewardship
133 William Street – Room 304
New Bedford, Massachusetts 02740

Re: PCB Risk-Based Disposal Approval under 40 CFR § 761.61(c)
Former Polymerine Site
241 Duchaine Boulevard, New Bedford, MA
MassDEP RTN: 4-1347

Dear Ms. Paul:

This is in response to the Notification¹ by the City of New Bedford (“the City”) for approval of a PCB risk-based disposal plan under 40 CFR § 761.61(c) to address PCB contamination on the property located at 241 Duchaine Boulevard (“the Site”) in New Bedford, Massachusetts. Specifically, PCB concentrations in soil and in the building exceed the PCB level for unrestricted use under the federal PCB regulations at 40 CFR § 761.61(a) and § 761.62.

The City has proposed the following plan to address PCB-contaminated “upland” soils and the building that includes the following activities (also see Attachments 2, 3, and 4):

- Decontaminate PCB-contaminated equipment and collect verification samples to confirm that PCB concentrations are less than (“<”) 10 µg/100 cm²
- Remove water from the former boiler room and former hydraulic press pits and from the former holding tank beneath the former boiler room floor for on-site treatment and disposal

¹ Information was submitted by Tighe & Bond on behalf of the City to support a risk-based disposal approach for *PCB remediation waste* under 40 CFR § 761.61(c). Information was provided dated July 2015 (TSCA Notification and Phase IV Remedy Implementation Plan); December 15, 2015 (email clarification on funding); December 30, 2015 (PCB Cleanup Plan Addendum No. 1); February 9, 2016 (email responses to EPA February 8, 2016 comments); February 12, 2016 (PCB Cleanup Plan Addendum No. 2); April 18, 2016 (email response to EPA April 13, 2016 comments on equipment decontamination and excluded PCB products); May 3, 2016 (Addendum No. 2 Figure 1 revised); and, May 9, 2016 (email clarification on Figure 12 Proposed Excavation Plan). These submissions will be referred to as the “Notification.”

- Remove *PCB bulk product waste* (e.g., caulk and 12 inches of adjacent brick) and dispose off-site in accordance with 40 CFR § 761.62
- Remove *PCB remediation waste* (i.e., northern end painted and oil-stained CMU walls and greater than or equal to (\geq) 500 parts per million (“ppm”) PCBs concrete floor) and dispose off-site in accordance with 40 CFR § 761.61(a)(5)(i)(B)(2)(iii)
- Place < 500 ppm *PCB remediation waste* associated with the former building (i.e., uncoated/unpainted concrete outside of former boiler room) into the consolidation area where a TSCA-compliant cap will be constructed
- Remove soil with PCBs ≥ 500 ppm and dispose offsite in accordance with 40 CFR § 761.61(a)(5)(i)(B)(2)(iii)
- Remove and relocate into the consolidation area, PCB-contaminated “upland” soil with ≥ 1 ppm within 2 feet below ground surface and ≥ 25 ppm from areas deeper than 2 feet below ground surface, and backfill excavation areas with clean soil
- Collect post-excavation soil samples to confirm that the PCB cleanup standards have been met for soil located outside the consolidation and TSCA-compliant cap area
- Construct a permanent capping system over the consolidation area to include a warning barrier, 1-foot of gravel borrow and 6-inches of pavement to meet the TSCA cap requirements under 40 CFR § 761.61(a)(7)
- Record a deed notice in the form of an Activity and Use Limitation (“AUL”) to document Site conditions, establish use restrictions, and identify obligations and conditions which must be maintained to ensure that the PCBs and other contaminants remaining at the Site pose no unreasonable risk of injury to health or the environment.

The City has determined that certain building materials (i.e., painted, non-oil stained concrete masonry unit (“CMU”) walls) which have PCB concentrations at < 50 ppm, meet the definition of *Excluded PCB Products* as defined under 40 CFR § 761.3. These materials will be removed and disposed of under the Massachusetts Department of Environmental Protection (“MassDEP”) Regulations.

Based on EPA's review, EPA has determined that the proposed plan is acceptable and that the PCBs remaining within the “upland” portion of the Site following the proposed work will not pose an unreasonable risk of injury to health or the environment as the PCBs will be covered with either a clean 2-foot soil cover or a TSCA-compliant cap. The soil cover and TSCA-compliant cap will prevent direct exposure to Site contaminants and will be maintained under a long-term inspection and maintenance plan. EPA applies this reasonable risk standard in accordance with the PCB regulations at 40 CFR § 761.61(c), and the Toxic Substances Control s” not “sediments”. How

The City may proceed with the project in accordance with 40 CFR § 761.61(c); 40 CFR § 761.62; the Notification; and, this Approval, subject to the conditions of Attachment 1. Please be aware that this Approval requires the City to provide an inventory of equipment to be decontaminated with a decontamination and verification sampling work plan (see Attachment 1, Condition 14).

This Approval may be revoked, suspended and/or modified as described in Attachment 1, or if the EPA determines that implementation of this Approval may pose an unreasonable risk of injury to health or the environment, or if there is a change in the Site use. This Approval does not address cleanup of the wetland area. As indicated in the Notification, the City will address the wetland area under a separate plan.

Nothing in this Approval is intended or is to be construed to prejudice any right or remedy concerning PCBs or other federally-regulated contaminants at the Site otherwise available to the EPA under Section 6 of TSCA, 15 U.S.C. 2605, 40 CFR Part 761, or other provisions of federal law.

This Approval does not release the City from any applicable requirements of TSCA or any other federal, state or local law, including the requirements related to cleanup and disposal of PCBs or other contaminants under the MassDEP regulations.

EPA encourages the compliance with greener cleanup practices for all cleanup projects, and recommends adherence to the ASTM Standard Guide to Greener Cleanups E2893-13 (Guide) for work conducted under this Approval and the Notification. Greener cleanups is the practice of integrating options that minimize the environmental impacts of cleanup actions in order to incorporate practices that maximize environmental and human benefit. Please see Section 6 of the Guide for the Best Management Practices (BMP) Process dated December 19, 2013. (*See www.astm.org/Standards/E2893.htm for additional information*) EPA encourages you to review the Guide and implement any practices that are feasible. If implemented, the PCB completion report (see Attachment 1, Condition 31) should include a section on BMP Documentation, as described in Section 6.6.5 of the Guide.

Questions and correspondence regarding this Approval should be directed to:

Kimberly N. Tisa, PCB Coordinator (OSRR07-2)
United States Environmental Protection Agency
5 Post Office Square, Suite 100
Boston, Massachusetts 02109-3912
Telephone: (617) 918-1527
Facsimile: (617) 918-0527

EPA shall consider this project complete only when it has received documents evidencing construction of the physical controls (i.e., soil cover and TSCA cap) and adoption of the deed restriction (i.e., AUL). Please be aware that upon EPA receipt and review of the submittals, EPA may request any additional information necessary to establish that the work has been completed in accordance with 40 CFR Part 761, the Notification, and this Approval.

Sincerely,

A handwritten signature in black ink, appearing to read "Bryan Olson", followed by a long horizontal line extending to the right.

Bryan Olson, Director
Office of Site Remediation & Restoration

Attachment 1: Approval Conditions

Attachment 2: Summary of Proposed Waste Management Table

Attachment 3: Revised Figure 1, Proposed Building Materials Management Plan

Attachment 4: Figure 12, Proposed Excavation Plan

cc: Todd Kirton, Tighe & Bond
SERO: RTN 4-1347
New Bedford Conservation Commission
File

ATTACHMENT 1

PCB RISK-BASED DISPOSAL APPROVAL CONDITIONS FORMER POLYMERINE SITE (“the Site”) 241 DUCHAINE BOULEVARD, NEW BEDFORD, MA

GENERAL CONDITIONS

1. This Approval is granted under the authority of Section 6(e) of the Toxic Substances Control Act (TSCA), 15 U.S.C. § 2605(e), and the PCB regulations at 40 CFR Part 761, and applies solely to *PCB remediation waste* and *PCB bulk product waste* identified in the Notification¹ and located on the Site. This Approval does not address cleanup of PCB-contaminated wetland sediment or soil.
 - a. In the event that the City of New Bedford (“the City”) identifies other PCB-contaminated wastes (i.e., PCBs not identified or addressed in the Notification) subject to cleanup and disposal under the PCB regulations, the City will be required to notify EPA and to clean up the PCB-contaminated wastes in accordance with 40 CFR Part 761.
 - b. The City may submit a separate plan to address such other PCB-contaminated wastes or may request to modify the Notification to incorporate cleanup of the PCBs under this Approval in accordance with Condition 22.
2. This Approval shall expire 10 years from the date of signature, unless extended, renewed, suspended, modified, revoked, or terminated in accordance with the conditions stated herein.
3. Application for renewal or extension of this Approval shall be made in writing at least 180 days, but not more than 270 days, prior to the expiration date. Application for renewal must include information to demonstrate that the institutional and engineered controls (e.g., surface soil cover and TSCA-compliant cap) remain effective in mitigating risks from PCBs and that the City (or a subsequent owner of the property subject to the terms of this Approval) has met and will continue to meet all conditions of this Approval. In reviewing the application for renewal, EPA will consider whether Site controls are effective, if additional measures are necessary to ensure no unreasonable risk of injury to health or the environment, and whether Approval conditions have been met. EPA may require the submission of additional information in connection with any renewal application.

¹ Information was submitted by Tighe & Bond on behalf of the City to support a risk-based disposal approach for *PCB remediation waste* under 40 CFR § 761.61(c). Information was provided dated July 2015 (TSCA Notification and Phase IV Remedy Implementation Plan); December 15, 2015 (email clarification on funding); December 30, 2015 (PCB Cleanup Plan Addendum No. 1); February 9, 2016 (email responses to EPA February 8, 2016 comments); February 12, 2016 (PCB Cleanup Plan Addendum No. 2); April 18, 2016 (email response to EPA April 13, 2016 comments on equipment decontamination and excluded PCB products); May 3, 2016 (Addendum No. 2 Figure 1 revised); and, May 9, 2016 (email clarification on Figure 12 Proposed Excavation Plan). These submissions will be referred to as the “Notification.”

4. The City shall conduct on-site activities in accordance with the conditions of this Approval and with the Notification.
5. In the event that the activities described in the Notification differ from the conditions specified in this Approval, the conditions of this Approval shall govern.
6. The terms and abbreviations used herein shall have the meanings as defined in 40 CFR § 761.3 unless otherwise defined within this Approval.
7. The City must comply with all applicable federal, state and local regulations in the storage, handling, and disposal of all PCB wastes, including PCBs, PCB Items and decontamination wastes generated under this Approval.
8. The City is responsible for the actions of all officers, employees, agents, contractors, subcontractors, and others who are involved in activities conducted under this Approval. If at any time the City has or receives information indicating that the City or any other person has failed, or may have failed, to comply with any provision of this Approval, it must report the information to EPA in writing within 24 hours of having or receiving the information.
9. This Approval does not constitute a determination by EPA that the transporters or disposal facilities selected by the City are authorized to conduct the activities set forth in the Notification. The City is responsible for ensuring that its selected transporters and disposal facilities are authorized to conduct these activities in accordance with all applicable federal, state and local statutes and regulations.
10. This Approval does not: a) waive or compromise EPA's enforcement and regulatory authority; b) release the City from compliance with any applicable requirements of TSCA or any other federal, state or local law; or c) release the City from liability for, or otherwise resolve, any violations of TSCA or any other federal, state or local law.
11. Failure to comply with the Approval conditions specified herein shall constitute a violation of the requirement in 40 CFR § 761.50(a) to store or dispose of PCB waste in accordance with 40 CFR Part 761, Subpart D.

NOTIFICATION AND CERTIFICATION CONDITIONS

12. This Approval may be revoked if the EPA does not receive written notification from the City of its acceptance of the conditions of this Approval within 10 business days of receipt.
13. The City shall notify EPA in writing of the scheduled date of commencement of on-site activities at least one business day prior to conducting any work under this Approval.

14. Prior to initiating onsite work under this Approval, the City shall submit the following information:
- a. an inventory of equipment that will be decontaminated under the Notification and this Approval, and a decontamination and verification sampling work plan, which may be incorporated into the contractor work plan;
 - b. a certification signed by the selected analytical laboratory, stating that the laboratory has read and understands the analytical and quality assurance requirements specified in the Notification and in this Approval;
 - c. a contractor work plan prepared and submitted by the selected contractor(s), detailing the procedures that will be employed for building demolition, including removal of PCB-contaminated building materials, removal and/or relocation of PCB-contaminated soil and building debris, and construction of the soil cover and TSCA compliant cap. The work plan should include information on waste storage, handling, and disposal of generated PCB waste and for equipment decontamination; and,
 - d. a certification signed by its selected remediation contractor, stating that the contractor has read and understands the Notification, and agrees to abide by the conditions specified in this Approval.

CLEANUP AND DISPOSAL CONDITIONS

15. *PCB remediation waste* and *PCB bulk product* shall be removed and disposed of as described in the Notification and as summarized in Attachments 2, 3, and 4.
- a. *PCB remediation waste* (i.e., soil) samples shall be collected on a bulk basis (i.e., mg/Kg) and reported on a dry-weight basis. Soil samples shall be collected from both excavation bottoms and sidewalls, as applicable. *Porous surfaces* (e.g., concrete) samples shall be collected in accordance with the EPA Region 1 *Standard Operating Procedure for Sampling Porous Surfaces for Polychlorinated Biphenyls (PCBs) Revision 4, May 5, 2011*, at a maximum depth interval of 0.5 inches.
 - b. Chemical extraction for PCBs shall be conducted using Methods 3500B/3540C of SW-846 for solid matrices and Method 3500B/3510C of SW-846 for aqueous matrices; and, chemical analysis for PCBs shall be conducted using Method 8082 of SW-846, unless another extraction and/or analytical method(s) is validated according to Subpart Q.

16. All PCB waste (regardless of concentration) generated as a result of the activities described in the Notification, excluding any decontaminated materials, shall be marked in accordance with 40 CFR § 761.40 and § 761.45; stored in a manner prescribed in 40 CFR § 761.65; and, disposed of in accordance with 40 CFR § 761.61(a)(5) and § 761.62, unless otherwise specified below:
- a. Non-liquid cleaning materials, such as PPE and similar materials resulting from decontamination, shall be disposed of in accordance with 40 CFR § 761.79(g)(6).
 - b. Moveable equipment, tools, and sampling equipment shall be decontaminated in accordance with either 40 CFR § 761.79(b)(3)(i)(A), § 761.79(b)(3)(ii)(A), or § 761.79(c)(2).
 - c. PCB-contaminated water generated during decontamination or dewatering shall be decontaminated in accordance with 40 CFR § 761.79(b)(1) or disposed of under 40 CFR § 761.70.

DEED RESTRICTION AND USE CONDITIONS

17. Within 30 days of completing the activities described in the Notification and authorized in the Approval, the City shall submit for EPA review and approval, a draft deed restriction for the Site. The deed restriction shall include: a description of the extent and levels of contamination at the Site following remediation; a description of the actions taken at the Site; a description of the use restrictions and conditions for the Site; and, the long-term monitoring and maintenance requirements for the caps which may be addressed by the long-term monitoring and maintenance plan ("MMP", see Condition 21). Within ten (10) business days of receipt of EPA's approval of the draft deed restriction, the City shall record the deed restriction. A copy of this Approval shall be attached to the deed restriction.

SALE, LEASE, OR TRANSFER CONDITIONS

18. The City shall notify the EPA of the sale, lease or transfer of any real estate interest in the Site that has an effect of allocating or sharing any responsibility for complying with this Approval to or with a different person. Such notice shall be in writing no later than sixty (60) days prior to such action. This notification shall include the name, address, and telephone number of the new entity acquiring such an interest in the Site. In the event that the City sells, leases, or transfers any such real estate interest, the City shall continue to be bound by all the terms and conditions of this Approval, unless EPA approves the allocation of some or all of this Approval's responsibilities to the new owner(s), lessee or transferee. The notification procedures are as follows:

- a. The new owner(s), lessee or transferee must request, in writing, that the EPA allocate some or all obligations and responsibilities under the Approval to the new owner(s), lessee or transferee;
 - b. The EPA reviews the request, and determines whether to allocate some or all of the obligations and responsibilities under the Approval to the new owner(s), lessee, or transferee; and,
 - c. The new owner(s), lessee or transferee provides written notification to the EPA of its acceptance of and intention to comply with the terms and conditions of the Approval or new approval, should EPA deem a new approval is necessary. The Approval or new approval may be withdrawn if the EPA does not receive written notification from the new owner(s), lessee or transferee of its acceptance of, and intention to comply with, the terms and conditions of the Approval or new approval within thirty (30) days of its receipt of the Approval or the new approval. Under such circumstances, all terms and conditions of this Approval will continue to be binding on the City.
19. In the event that the sale, lease or transfer of a real estate interest in the Site will involve or result in a change in the use of the Site, EPA may revoke, suspend, and/or modify this Approval or the new approval if it finds, due to the change in use, that this PCB risk-based disposal action will not be protective of health or the environment. The owner shall record any amendment to the deed restriction, resulting from any approved modification(s), within sixty (60) days of such change(s).
20. In any sale, lease or transfer of a real estate interest in the Site, the City shall retain sufficient access rights to enable it to continue to meet their obligations under this Approval, except as provided above.

INSPECTION, MONITORING, MODIFICATION AND REVOCATION CONDITIONS

21. Within 30 days of completion of work authorized under this Approval, the City shall submit for EPA's review and approval, a detailed long-term monitoring and maintenance plan ("MMP") for the surface covers, including the soil cover and the TSCA-compliant cap. The City shall incorporate any changes to the MMP required by EPA.
- a. The MMP shall include: a description of the activities that will be conducted, including inspection criteria, frequency, and routine maintenance activities; sampling protocols, sampling frequency, and analytical criteria; and reporting requirements.
 - b. The MMP shall include a communications component which details how the maintenance and monitoring results will be communicated to interested stakeholders.

- c. The MMP also shall include a worker training component for maintenance workers or for any person that will be conducting work that could impact the soil cover and/or the TSCA-compliant cap.
 - d. The City shall submit the results of the long-term monitoring and maintenance activities to EPA. Based on its review of the results, EPA may determine that modification to the MMP is necessary in order to maintain, monitor and/or evaluate the effectiveness of the soil cover and TSCA-compliant cap.
 - e. Activities required under the MMP shall be conducted until such time that EPA determines, in writing, that such activities are no longer necessary.
22. Any modification(s) in the plan, specifications, or information submitted by the City, contained in the Notification, and forming the basis upon which this Approval has been issued, must receive prior written approval from the EPA. The City shall inform the EPA of any modification, in writing, at least 10 days prior to such change. No action may be taken to implement any such modification unless the EPA has approved of the modification, in writing. The EPA may request additional information in order to determine whether to approve the modification.
23. If a modification involves a change in the use of the Site which results in exposures not considered in the Notification, the EPA may revoke, suspend, and/or modify this Approval upon finding that this risk-based disposal action may pose an unreasonable risk of injury to health or the environment due to the change in use. EPA may take similar action if the EPA does not receive requested information needed from the City to make a determination regarding potential risk.
24. The City shall record any amendment to the deed restriction, resulting from any approved change or modification(s), within sixty (60) days of such change(s). (See Condition 17).
25. Any departure from the conditions of this Approval without prior, written authorization from the EPA may result in the revocation, suspension and/or modification of the Approval, in addition to any other legal or equitable relief or remedy the EPA may choose to pursue.
26. Any misrepresentation or omission of any material fact in the Notification or in any future records or reports may result in the EPA's revocation, suspension and/or modification of the Approval, in addition to any other legal or equitable relief or remedy the EPA may choose to pursue.

27. Approval for these activities may be revoked, modified or otherwise altered if: EPA finds a violation of the conditions of this Approval or of 40 CFR Part 761, including EPA's PCB Spill Cleanup Policy, or other applicable rules and regulations; EPA finds that these activities pose an unreasonable risk of injury to health or the environment; EPA finds that there is migration of PCBs from the Site; or, EPA finds that changes are necessary to comply with new rules, standards, or guidance for such approvals. The City may apply for appropriate modifications in the event new rules, standards, or guidance come into effect.
28. The City shall allow any authorized representative of the Administrator of the EPA to inspect the Site and to inspect records and take samples as may be necessary to determine compliance with the PCB regulations and this Approval. Any refusal by the City to allow such an inspection (as authorized by Section 11 of TSCA) shall be grounds for revocation of this Approval.

RECORDKEEPING AND REPORTING CONDITIONS

29. The City shall prepare and maintain all records and documents required by 40 CFR Part 761, including, but not limited to, the records required by Subparts J and K. The City shall maintain a written record of the PCB remediation work and the analytical sampling conducted under this Approval. All records shall be made available for inspection by authorized representatives of the EPA, until such time as EPA approves in writing a request for an alternative disposition of such records.
30. As required under Condition 21 of this Approval, the City shall submit the results of the monitoring and maintenance activities to EPA as specified in the final MMP to be approved by EPA.
31. The City shall submit to EPA a Final Completion Report ("Report") in both hard and electronic formats (e.g., CD-ROM) within 120 days of completion of the activities described under this Approval. At a minimum, this Report shall include:
 - a. a discussion of the project activities with photo-documentation and Greener Cleanups BMPs, if implemented; documentation of soil surface cover and TSCA-compliant cap construction; characterization and verification sampling analytical results with figures showing sampling locations; copies of the accompanying analytical chains of custody; field and laboratory quality control/quality assurance checks; an estimate of the quantity of PCBs removed and disposed off-site; copies of manifests and/or bills of lading or equivalent; and, copies of certificates of disposal or similar certifications issued by the disposer;
 - b. a certification signed by a City official verifying that the authorized activities have been implemented in accordance with this Approval and the Notification; and,

- c. the signed certification required under 40 CFR § 761.61(a)(8)(i)(B) that the deed restriction (e.g., Activity and Use Limitation or “AUL”) has been recorded as required under 40 CFR § 761.61(a)(8)(i)(A). A copy of the executed deed restriction must also be submitted.
32. Required submittals shall be mailed to:
- Kimberly N. Tisa, PCB Coordinator
United States Environmental Protection Agency
5 Post Office Square, Suite 100
Mail Code: OSRR07-2
Boston, Massachusetts 02109-3912
33. No record, report or communication required under this Approval shall qualify as a self-audit or voluntary disclosure under EPA audit, self disclosure or penalty policies.

END OF ATTACHMENT 1

TABLE 1 - PCB Cleanup Plan Addendum No. 2 Submittal*

Summary of Proposed Waste Management of PCB-Impacted Materials
Former Polymerine, Inc.
241 Duchaine Boulevard
New Bedford, Massachusetts

Material Type	Description	Quantity (Approximate)	PCB Concentration	TSCA Classification	Proposed Material Management	Verification Sampling
PCB Bulk Product Wastes						
Caulking material (both ACM and non-ACM ⁽¹⁾)	Approximately 50 feet of expansion joint caulking materials identified between the metal window frame and the brick on north (and south) entranceways to the former office area - earlier caulking sample PCB-04 detected PCBs at 149 ppm. Other miscellaneous caulking areas that total less than 300 linear feet were also identified in the building during the pre-demolition building audit, including caulking material represented by earlier sample PCB-01 (PCBs at 5.45 ppm). Due to the variability of these caulking areas and to avoid additional caulking characterization, all miscellaneous caulking will be abated as a PCB Bulk Product Waste.	350 feet	5.45 ppm to 149 ppm	PCB Bulk Product Waste - to be disposed at a state permitted landfill that meets requirements of 761.62(b)	All caulking will be removed from the building prior to demolition and disposed as a PCB Bulk Product Waste. In addition, 12 inches of the abutting brick and/or CMU wall (where applicable) will also be segregated for disposal as a PCB Bulk Product Waste. As also applicable, window frames will be removed for disposal as a PCB Bulk Product Waste.	Porous substrate areas that remain in locations where caulking and associated porous substrates were removed as a Bulk Product Waste, will be verify sampled. One sample per 20 feet of substrate will be sampled to confirm the remaining substrate is less than 1 ppm. Total number of samples anticipated is approximately 20.
Window Glazing ⁽²⁾	Window glazings. Due to the variability of these materials and to avoid additional characterization, all window glazing will be abated as a PCB Bulk Product Waste. Note that the glazing will also be abated as an asbestos waste.	4' x 4' (or smaller) exterior windows (total number 55); 3' x 5' sections of interior windows (total number 3)	0.956 ppm	Classified as Excluded waste; however, will be disposed as a PCB Bulk Product Waste at a state permitted landfill that meets requirements of 761.62(b)	All glazing will be removed from the building prior to demolition and disposed at a state permitted landfill that meets bulk product waste requirements of 761.62(b). This will include the removal of the intact window and frames for disposal as a PCB Bulk Product Waste and asbestos waste	No verification sampling is necessary at the complete window systems will be removed.
PCB Remediation Wastes						
Oil-stained CMU Walls (painted)	Oil-stained CMU materials located on the former boiler room (including the interior separation walls between the former boiler room and the former machine shop, the former "main" room, and the hallway entrance), in the former machine shop (including the interior separation between the former machine shop and the former "main" room), and on the western portion of the former "main" room in the vicinity of the former hydraulic press.	275 tons	50 ppm to 100,000 ppm	To be disposed at TSCA chemical waste landfill per 40 CFR 761.75	Although the oil-staining is generally only on the lower portions of the walls, the entire CMU wall (floor to ceiling) will be segregated during building demolition.	None
Concrete Floor (≥500 ppm)	Concrete floor from the entire former boiler room area (including the "water pit" concrete walls and base)		240 ppm to 78,000 ppm	To be disposed at TSCA chemical waste landfill per 40 CFR 761.75	Segregate during building demolition	None
Concrete Floor (<500 ppm)	Concrete floor in all areas outside of the former boiler room	1,000 tons	0.91 ppm to 92 ppm	To be managed on site under a capping system per CFR 761.61(a)(7)	Segregate during building demolition	None
Non-porous Surfaces (Metal)	Former hydraulic press and the punch press unit; heat exchanger and associated piping.		79 to 3,100 ug/100 cm ²	PCB Remediation Waste to be decontaminated on site	Prior to or as part of building demolition activities, non-porous surfaces will be decontaminated in accordance with 40 CFR 761.360 through 40 CFR 761.378 of the TSCA regulations.	⁽²⁾ The decontaminated non-porous surfaces will be sampled using wipe samples to confirm that the residual PCB concentrations are less than the high occupancy standard of 10 ug/100 cm ² . A total of 5 wipe samples (each) will be collected from the decontaminated hydraulic press and from the punch press unit (5 samples each). For the heat exchanger (and associated piping), access to the interior of the components will be conducted as part of demolition, and wipe samples will be collected. If detections above 10 ug/100 cm ² are detected, a separate submittal to EPA will be prepared requesting approval for decontamination of the equipment or for disposal to a smelter. Thorough decontamination of interior piping components may not be feasible.

TABLE 1 - PCB Cleanup Plan Addendum No. 2 Submittal*

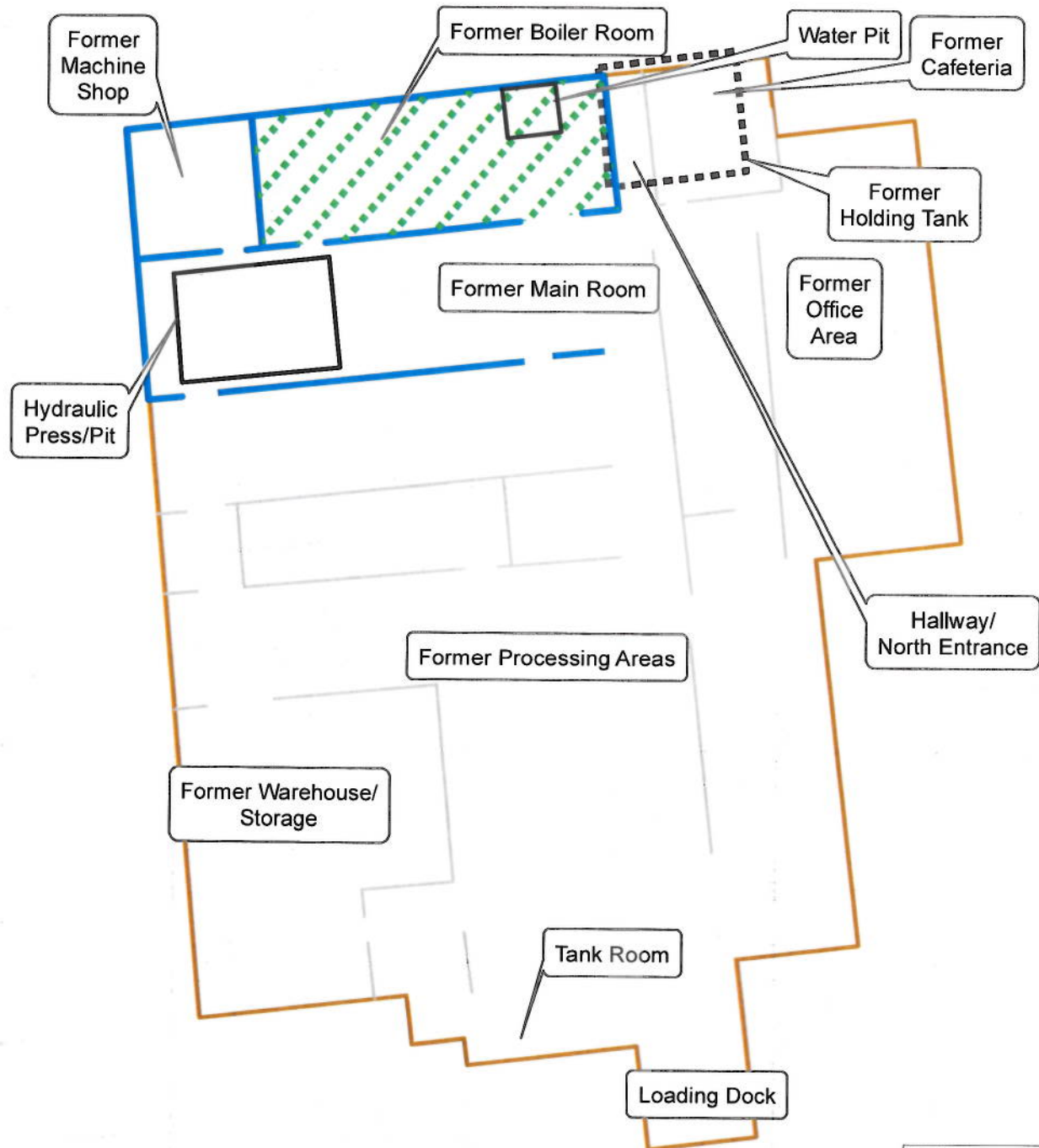
Summary of Proposed Waste Management of PCB-Impacted Materials
Former Polymerine, Inc.
241 DuChaine Boulevard
New Bedford, Massachusetts

Material Type	Description	Quantity (Approximate)	PCB Concentration	TSCA Classification	Proposed Material Management	Verification Sampling
Water in Pits	Water in the water pit in former boiler room, the former hydraulic press pit in the former "main" room, former holding tank located beneath the eastern end of the former boiler room.	30,000 gallons	ND to 0.55 ppb	PCB Remediation Waste	As part demolition activities, the water from the two open pits and from the former holding tank will be pumped out to a frac tank for temporary storage. The water will be treated through activated carbon adsorption, temporarily stored, sampled and then discharged on site.	^{1,2} To confirm that PCBs in the treated water are less than 0.5 µg/L (i.e., the MCP Method 1, GW-1 standard) following treatment and prior to discharge, a total of 5 samples will be collected from the treated water.
Soils (≥500 ppm)	Proposed Excavation Areas #1, #2, and #3	470 cubic yards	≥500 ppm	To be disposed at TSCA chemical waste landfill per 40 CFR 761.75	Contaminated soil excavation will occur per the PCB Cleanup Plan.	Samples to be collected at 10-foot intervals along the sidewalls and at the base of the excavations. For sidewall samples, samples to be collected vertically every two feet. Total number of samples anticipated for these three excavation areas is approximately 110.
Soils (≥25 ppm)	Proposed Excavation Areas #4, #5 and #7	430 cubic yards	≥25 ppm and <500 ppm	To be managed on site under a capping system per CFR 761.61(a)(7)	Contaminated soil excavation will occur per the PCB Cleanup Plan.	Samples to be collected at 10-foot intervals along the sidewalls and at the base of the excavations. For sidewall samples, samples to be collected vertically every two feet. Total number of samples anticipated for these three excavation areas is approximately 120.
Soils (≥1 ppm)	Proposed Excavation Area #6	200 cubic yards	≥1 ppm and <25 ppm	To be managed on site under a capping system per CFR 761.61(a)(7)	Contaminated soil excavation will occur per the PCB Cleanup Plan.	Sample to be collected at 25-foot intervals along the sidewalls across the two foot excavation depth interval. Total number of samples anticipated for this excavation areas is approximately 15.
Groundwater (dewatering)	Dewatering will likely be needed for proposed Excavation Areas #1, #2, #3, #5, and #7.	Volume of water to be generated by dewatering efforts during contaminated soil excavation work will be contingent upon Contractor's means/method and schedule to complete excavations.	ND to 0.25 ppb (dissolved concentrations in groundwater)	To be treated and discharged on site.	Groundwater will be pumped from sumps installed within the excavations to a frac tank for temporary storage, then treated through activated carbon before being discharged to the subsurface within or immediately upgradient of the respective excavations.	To confirm that PCBs in the treated groundwater (and water from pits) are less than 0.5 µg/L (i.e., the MCP Method 1, GW-1 standard), a sample will be collected for the first 5,000 gallons of discharge and then one sample collected for every 20,000 gallons generated thereafter.
Excluded PCB Products						
Non-oil stained CMU Walls (painted)	CMU materials in the former processing areas (including the eastern interior wall between the former processing areas and former "main" room), the former warehouse room, and the former tank room	300 tons	ND to <50 ppm, with paint being the source of the PCBs	Excluded PCB Products	Segregate prior to demolition and dispose at a state permitted landfill.	None

*Unless otherwise noted, this summary table is based on the contents of the August 2015 PCB Cleanup Plan and December 2015 PCB Cleanup Plan Addendum No. 1 submittals.

¹ ACMV - asbestos containing materials.

² These items were either not addressed in or have been modified from the August 2015 PCB Cleanup Plan submittal.



All Tighe & Bond Locations Are Considered Approximate

- Building
- Water Pit (See Note 3)
- Interior Walls (not all shown)
- Oil Stained CMU Walls to be disposed as PCB Remediation Waste (See Note 1)
- Concrete Floors w/PCBs >500 ppm to be disposed as PCB Remediation Waste (See Note 2)

- Notes:
1. Non-oil stained CMU walls to be managed off-site as Excluded PCB Product
 2. Concrete floor w/PCBs <500 ppm to be managed on-site
 3. Water from pits and former holding tank to be treated and discharged on site.

0 15 30
Feet

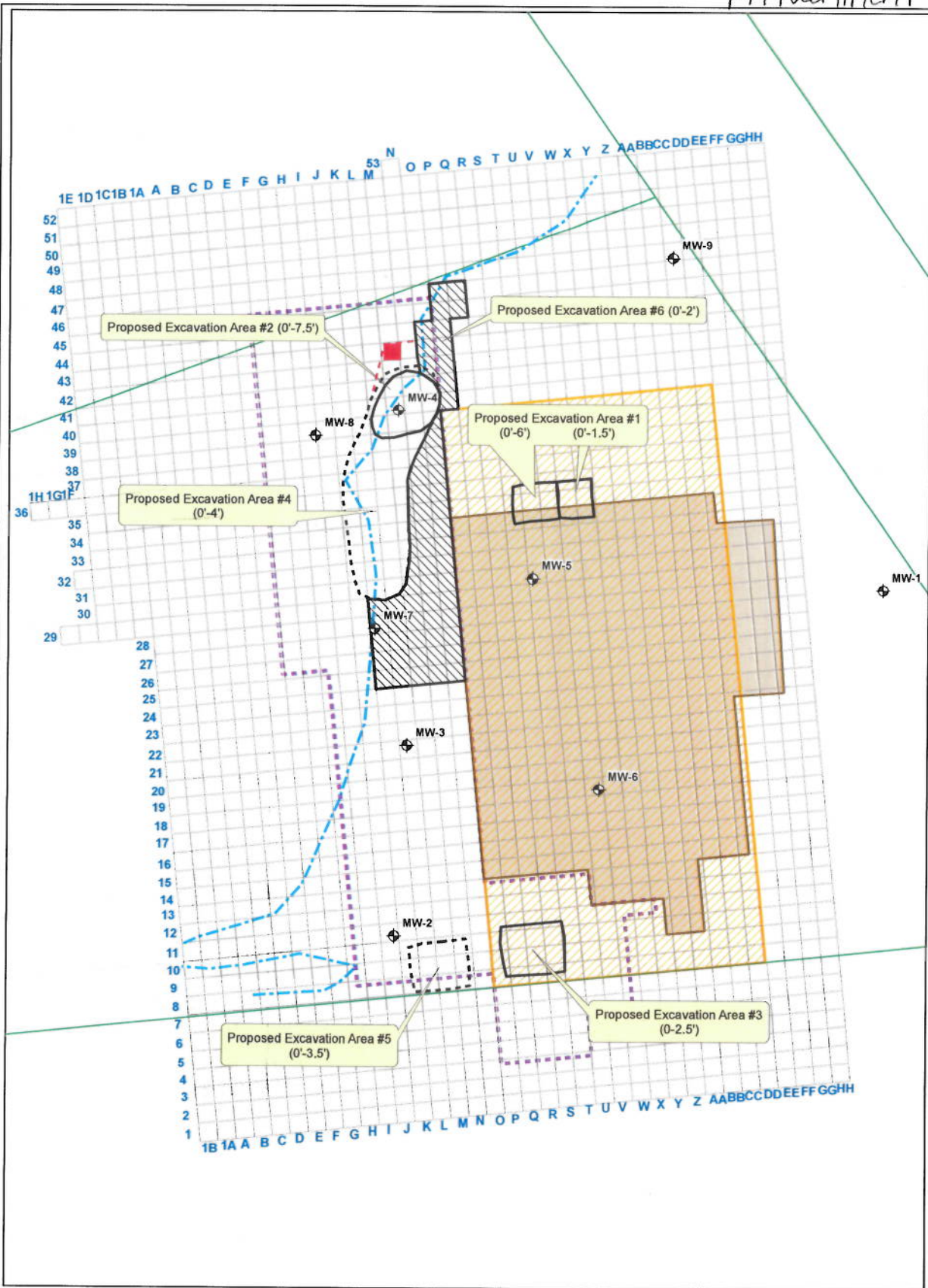


Revised

ADDENDUM NO. 2 - FIGURE 1 PROPOSED BUILDING MATERIALS MANAGEMENT PLAN

Former Polyply
241 Duchaine Blvd
New Bedford, MA

February 2016



Legend	
	Monitoring Well
	EPA Excavation Area
	Proposed Excavation of PCBs ≥ 500
	Proposed Excavation of PCBs ≥ 25
	Proposed Excavation of PCBs ≥ 1
	Proposed/Conceptual Area for PCB Consolidation & TSCA Cap
	10' x 10' T&B Soil Sampling Grid
	Buildings
	Wetland Boundary
	Property Line

**FIGURE 12:
PROPOSED EXCAVATION PLAN**

241 Duchaine Blvd
New Bedford, MA

Tighe Bond

July 2015

